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**BROOKDALE SENIOR LIVING INC.
 and BROOKDALE SENIOR LIVING
 COMMUNITIES, INC.**

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

STACIA STINER, et al.,
 Plaintiffs,

v.

BROOKDALE SENIOR LIVING INC., et
 al.
 Defendants.

Case No. 4:17-cv-03962-HSG

**PARTIES' STIPULATION FOR
 OMNIBUS MOTION TO
 SEAL; ORDER**

1 Plaintiffs and Defendants (collectively, the “Parties”), by their undersigned counsel, respectfully
2 stipulate as follows:

3 WHEREAS, when the Parties have filed multiple requests to seal in this matter, the Court has
4 ordered the parties to consolidate the pending requests into a single, omnibus motion to seal once the
5 Parties had completed briefing the issue to which the sealing requests related (*see* ECF Nos. 549 & 635);

6 WHEREAS, per the Court’s order dated August 9, 2024, dispositive motions shall be filed by
7 September 5, 2024, responses shall be filed by September 26, 2024, and replies shall be filed by October
8 10, 2024 (*see* ECF No. 835 at 6);

9 WHEREAS, the Parties anticipate filing a substantial volume of material with the
10 aforementioned briefs that Defendants either have designated as “Confidential” pursuant to the
11 Stipulated Protective Order governing the case (ECF No. 127) or that discuss the substance of such
12 documents or contain information similar to information previously identified as confidential by
13 Defendants, such that the Parties anticipate the need to file multiple requests to seal in connection with
14 the briefs;

15 WHEREAS, Defendants believe that filing an omnibus motion to seal that consolidates all of the
16 anticipated requests related to the Parties’ dispositive motions, responses, and replies in a single filing in
17 a similar fashion as the Court has ordered previously (*see* ECF Nos. 549 & 635) will streamline the
18 Court’s review and save judicial resources, including because much of the material at issue is expected
19 to be similar in nature;

20 WHEREAS, due to the substantial volume of material that the Parties anticipate the Parties may
21 file with their briefs, Defendants also believe that approximately thirty (30) days after the Parties’
22 deadline to file their replies in support of their dispositive motions would serve as an appropriate
23 deadline to file the omnibus motion to seal that Defendants propose;

24 WHEREAS, in order to streamline the process of making available on the public docket any
25 redacted documents in the event the Court grants the Parties’ requested omnibus motion to seal, the
26 Parties agree that Defendants will prepare copies of documents with the proposed redactions Defendants
27 believe are necessary to apply, and the Parties will file those versions on the public docket with their
28

omnibus motion to seal, rather than otherwise blank pages reading “EXHIBIT FILED UNDER SEAL” as indicated by Local Civil Rule 79-5(d); and

WHEREAS, the Parties have conferred and now hereby agree and stipulate as follows.

THEREFORE, IT IS HEREBY STIPULATED, subject to the approval of the Court, that:

1. The Parties shall file a single, omnibus motion to seal that consolidates all of their anticipated sealing requests related to their dispositive motions, responses, and replies in lieu of separate sealing requests no later than thirty (30) days after their replies are due. Defendants shall provide drafts of the omnibus motion to seal, the declaration in support, the proposed order, and copies of all documents Defendants wish to seal with their proposed redactions marked to Plaintiffs at least 7 days prior to the filing deadline.
2. When the Parties file the omnibus motion to seal, the copies of documents the Parties propose to redact that the Parties file on the public docket shall feature the proposed redactions applied, rather than an otherwise blank page reading “EXHIBIT FILED UNDER SEAL.”

IT IS SO STIPULATED.

DATED: September 3, 2024

MOORE & LEE, P.C.

/s/ Erica Rutner

Erica Rutner
Attorneys for Defendants

DATED: September 3, 2024

ROSEN BIEN GALVAN & GRUNFELD LLP

/s/ Jenny Yelin

Jenny Yelin
Attorneys for Plaintiffs and the Certified
Classes

ATTORNEY ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that all other signatures listed, in whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Erica Rutner
Erica Rutner

CERTIFICATE OF SERVICE


I hereby certify that on September 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Erica Rutner
Erica Rutner

ORDER

Pursuant to Stipulation, and for good cause shown, the Parties' Stipulation is GRANTED.

Dated: 9/3/2024


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge